

ROBERT MANN, CSB 48293
DONALD W. COOK, CSB 116666
 ATTORNEYS AT LAW
 3435 Wilshire Blvd., Suite 2900
 Los Angeles, CA 90010
 (213) 252-9444; (213) 252-0091 facsimile
 manncook@earthlink.net
 Attorneys for Plaintiff

NOTE: CHANGES MADE BY
 THE COURT

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

JULIO ALVARADO, an individual,

 Plaintiff,

vs.

WILLIAM J. BRATTON; LEE BACA;
 WILLIAM STONICH, Assistant Sheriff;
 LARRY W. WALDIE; DOYLE R.
 CAMPBELL, Assistant Sheriff; PAUL K.
 TANAKA, Assistant Sheriff; CHARLES
 JACKSON, Division Chief; MARC L.
 KLUGMAN, Division Chief individually
 and in their official capacities; CITY OF
 LOS ANGELES; CITY OF LOS
 ANGELES POLICE DEPARTMENT;
 COUNTY OF LOS ANGELES; LOS
 ANGELES COUNTY SHERIFF'S
 DEPARTMENT

Defendants.

Case No. CV06-7812 PA (RCx)
 (Assigned to the Hon. Percy
 Anderson)

[PROPOSED]
PROTECTIVE ORDER
REGARDING DISCLOSURE
OF CONFIDENTIAL
INFORMATION

DISCOVERY MATTER

Pursuant to the stipulation executed by Plaintiff and Defendants, **CITY OF LOS ANGELES and the LOS ANGELES POLICE DEPARTMENT**, (City Defendants) the Court issues the following protective order:

A. ITEMS COVERED BY THIS PROTECTIVE ORDER

1. The protective order applies only to the following:

a. The Los Angeles Police Department's Internal Affairs Investigation which relates to Plaintiff Julio Alvarado's arrest on November 5, 2005.

2. Should any party wish to stamp any of the above records as "CONFIDENTIAL" that party may not stamp the records in such a way as to cover any written portion of the records. The documents must remain completely legible.

B. USE OF RECORDS

1. Absent further order of the Court, the items covered by this protective order for this case only, including any appeals, and not for any other purpose whatsoever.

2. Items covered by this protective order, including any related copies, summaries, extracts, notes, photographs, memos, audiotapes and transcripts, shall not be disclosed, except to the following persons:

a. The attorneys of record, including legal assistants, paralegals, investigators and clerical employees working under counsel's supervision, as well as outside copying, graphic, computer services, and court reporters performing services in connection with this action;

b. Experts, consultants, investigators and their employees, retained and/or consulted by the attorneys of record to assist in the preparation of this action;

c. The parties, including their officers, agents and employees who are directly assisting counsel with the conduct or resolution of this action;

d. Witnesses while being examined by counsel at a deposition or trial. However, if the item is attached as an exhibit to a deposition transcript, the copy attached as an exhibit shall be redacted to omit names, birth dates, social security numbers, and addresses; and

e. The Court and its personnel.

1 3. Before any disclosure of the items covered by this protective order, they will
2 inform any person identified in Paragraph 2 above, of the terms of the protective order.

3 4. If any party wishes to disclose items covered by this protective order to any
4 person other than those listed in Paragraph 2, above, that party shall give written notice
5 to the non-disclosing party so that the non-disclosing party can make a motion to prevent
6 the disclosure. The party wishing to disclose the information will not to do so unless and
7 until agreement with the other party is reached, or the other party's motion is ruled on by
8 the court. If however, the other party does not file its motion within two weeks of the
9 notice, the party wishing to disclose the information may deem the issue to have been
10 abandoned.

11 5. Upon final determination of this action, whether by judgment, settlement or
12 otherwise, including all appeals, and upon the producing party's request, Plaintiff shall
13 return those items, along with all copies, to the producing party. Any messenger or
14 postage fees shall be paid by the requesting party. In the alternative, the producing party
15 may request the items be destroyed.

16
17 **C. OTHER**

18 1. The execution of this protective order shall not preclude any party from moving
19 the court for other or further protective orders during this action.

20 2. This protective order is subject to amendment and modification by further
21 stipulation among counsel and/or by order of the Court.

22 ***IT IS SO ORDERED; as amended in paragraph 2.***

23
24 DATED:

25 ___/S/ ROSALYN M. CHAPMAN___
26 **ROSALYN M. CHAPMAN**
27 United States Magistrate Judge
28